

MEMO ENDORSED



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February 23, 2023

VIA ECF

Hon. Kenneth M. Karas
United States District Court, Southern District of New York
300 Quarropas Street, Chambers 521
White Plains, New York 10601

Re: Jane Doe v. County of Rockland et al., (Docket #: 21-cv-6751)

Dear Judge Karas,

We are the attorneys for the Plaintiff in the above referenced matter. On January 5, 2023, attorneys for the County of Rockland requested a thirty (30) day extension of the deadline for their combined reply brief and opposition to Plaintiff's Motion to File a Second Amended Complaint. Their request for a 30-day extension was granted, on consent, thereby making their deadline for submission February 9, 2023.

On February 3, 2023, we requested to file a Reply by February 23, 2023 since no date for a Reply had been issued. However, due to my continued engagement on trial in a six(6) co-defendant case, in the matter *US v. Nordean, et.al.*, United States District Court for the District of Columbia, Criminal Action Number 21-175 (TJK) before United States District Judge Timothy J. Kelly, and due to an unavoidable personal situation that my law partner and wife has been faced with, it has become impossible for this firm to finalize the Reply.

As such, we are requesting that we be given an extension to file our Reply to March 2, 2023, which is on consent and Mr. Weissman has expressed no objection.

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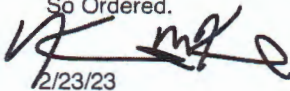
On another note, we are also requesting a conference in this case to discuss a partial withdrawal and modification of Plaintiff's Pending Cross Motion. The reason for the request will be discussed in greater detail in our Reply, to be submitted next week, if granted.

Thank you for your consideration.

Plaintiff's application for an extension of time to file her Reply Memorandum to 3/2/23 is granted. The request for a conference will be decided upon receiving the Reply Memorandum.

Respectfully submitted,

So Ordered.


2/23/23

/s/
Steven A. Metcalf, Esq.

Cc: Via ECF
Robert Weissman
Saretsky Katz & Dranoff, LLP

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